UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re.	i i
in re:	

SEARS HOLDINGS CORPORATION, et al.,

Debtors¹.

Chapter 11

Case No. 18-23538 (RDD)

(Jointly Administered)

MOTION FOR ADMISSION TO PRACTICE, PRO HAC VICE

TO THE HONORABLE COURT:

I, Camille N. Somoza Castelló (the "Applicant"), request admission *pro hac vice*, before Honorable Robert D. Drain, to represent Deportes Salvador Colom Inc. (Adv. Case No. 20-06667), Majestique Corporation (Adv. Case No. 20-06719), and any other creditors that retain me (the "Clients") in the captioned case and in any and all adversary proceedings and contested matters in which any of the Clients is or may become a party, and in support, submit as follows:

1. I certify that I am a member in good standing of the bar of the Commonwealth of Puerto Rico, and, the bar of the following jurisdictions:

Jurisdiction	Year admitted
U.S. District Court, District of Puerto Rico	2015
U.S. Court of Appeals, 1st Circuit	2017

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden. LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan. Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); and Sears Brands Management Corporation (5365). The location of the Debtors' corporate headquarters is 3333 Beyerly Road. Hoffman Estates, Illinois 60179.

U.S. Bankruptcy Appellate Panel, 1st Circuit	2017

- 2. In support of this document, the Applicant is submitting an affidavit stating (a) whether the applicant has ever been convicted of a felony, (b) whether the Applicant has ever been censured, suspended, disbarred or denied admission or readmission by any court, (c) whether there are any disciplinary proceedings presently against the Applicant and (d) the facts and circumstances surrounding any affirmative responses to (a) through (c) (the "Affidavit"). The Affidavit is attached hereto as **Exhibit I**.
- 3. Also in support of this document, Applicant is submitting a Good Standing Certificate from the Commonwealth of Puerto Rico, which is attached hereto as **Exhibit II**.
 - 4. I have submitted the filing fee of \$200.00 with this *pro hac vice* admission.

Respectfully submitted, San Juan, Puerto Rico Dated: December 16, 2020. Ferraiuoli uc

221 Ponce de León Avenue 5th Floor San Juan, PR 00917 PO Box 195168 San Juan, PR 00919-5168

Phone: (787) 766-7000 Fax: (787) 766-7001

By: Camille N. Somoza Castelló USDC-PR No. 302908 csomoza@ferraiuoli.com

Attorneys for Creditor Deportes Salvador Colom Inc., and Majestique Corporation